

**IN THE UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

**TZANN FANG, M.D.,**

**Plaintiff,**

**v.**

**HYATT CORPORATION, et al.**

**Defendants.**

**Case No. 3:19-CV-00362**

---

**HYATT CORPORATION**

**and**

**TYSONS CORNER HOTEL I, LLC**

**Third Party Plaintiffs**

**v.**

**HARVEY-CLEARY BUILDERS, et al.**

**Third Party Defendants.**

**DEFENDANT AND THIRD PARTY PLAINTIFFS’  
STATEMENT REGARDING PERSONAL JURISDICTION**

COME NOW Hyatt Corporation and Tysons Corner Hotel I, LLC (“Hyatt Defendants”) by and through counsel, BONNER KIERNAN TREBACH & CROCIATA, LLP, and file their Statement Regarding Personal Jurisdiction in this matter and in support thereof state as follows:

**Parties and Jurisdiction**

1. Plaintiff Tzann Fang, MD is a resident of the Commonwealth of Virginia residing at 13506 Chesdin Landing Drive, Chesterfield, Virginia 23838.

2. Defendant and Third Party Plaintiff Hyatt Corporation is a corporation organized under the laws of the State of Delaware, with its principal office located in the State of Illinois. It is the operator of the Hyatt Regency Hotel in Tysons Corner, Virginia.

3. Defendant and Third Party Plaintiff, Tysons Corner Hotel I, LLC is a limited liability company organized under the laws of the State of Delaware, with its principal office located in the State of California. No members of Tysons Corner Hotel, I, LLC are citizens of Virginia.

4. Third Party Defendant Callison RTKL, Inc., is a corporation organized under the laws of the State of Maryland, with its principal office also located in Maryland.

5. Third Party Defendant Harvey-Cleary Builders, Inc., is a corporation organized under the laws of the State of Texas, with its principal office also located in Texas.

6. Third Party Defendant, Blum Consulting Engineers, is a corporation organized under the laws of the State of Texas, with its principal office also located in Texas.

7. Third Party Defendant, Tyco SimplexGrinnell, is a corporation organized under the laws of the State of Wisconsin, with its principal office also located in Wisconsin.

8. Third Party Defendant, Code Consultants, Inc., is a corporation organized under the laws of the State of Missouri, with its principal office also located in Missouri.

9. Plaintiff is a citizen of Virginia and no other Defendants or Third Party Defendants are also citizens of Virginia. Therefore, there is complete diversity in this matter and the amount in controversy exceeds the sum of \$75,000, exclusive of interest and costs. Accordingly, this Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. § 1332.

10. Defendant Helix Electric, Inc. does not oppose the Defendants and Third Party Plaintiffs, Hyatt Corporation and Tysons Corner Hotel, LLC's Motion for Leave to File a Third Party Complaint.

DATE: August 23, 2019

Respectfully submitted,

**BONNER KIERNAN TREBACH &  
CROCIATA, LLP**

/s/ Michael Trumble

Michael L. Pivor, Esq. (VSB #75312)

Michael Trumble, Esq. (VSB #91133)

1233 20<sup>th</sup> Street, N.W., 8<sup>th</sup> Floor

Washington, DC 20036

(202) 712-7000 [tel]

(202) 712-7100 [fax]

mpivor@bonnerkiernan.com

mtrumble@bonnerkiernan.com

*Counsel for Hyatt Corporation and  
Tysons Corner Hotel I, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 23<sup>rd</sup> day of August, 2019, a true copy of the foregoing was served on all parties, via this Court's electronic filing system.

*/s/ Michael Trumble*

---

Michael Trumble